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UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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IN RE: BRIAN C. BOGERT, JR.   :   CHAPTER 13
        Debtor(s)   :
                                           :
      CHARLES J. DEHART, III   :
      STANDING CHAPTER 13 TRUSTEE   :
        Movant   :
                                           :
        vs.   :
                                           :
      BRIAN C. BOGERT, JR.   :
        Respondent(s)   :   CASE NO.   1-20-bk-03241

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TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

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AND NOW, this   19th   day of April, 2021, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1.   Debtor(s)' plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required.

2.   Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:

      a.   Current Profit and Loss Statement for eleven (11) months – May, 2020 through March, 2021.

3.   The Trustee provides notice to the Court as to the ineffectiveness of debtor(s) Chapter 13 Plan for the following reasons:

      a.   Clarification of debtor's counsel fees which are in conflict with 2016(b) Statement.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

      a.   Deny confirmation of debtor(s) plan.

b. Dismiss or convert debtor(s) case.

c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/James K. Jones
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 19th day of April, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

George Lutz, Esquire
1025 Berkshire Blvd, Suite 700
Wyomissing, PA 19610

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee2